

Date: Thu Jun 29 13:06:41 EDT 2017

From: Hope.Brian@epamail.epa.gov

To: CMS.OEX@epamail.epa.gov

Subject: FW: Tremont City Barrel Fill

942363

-----Original Message-----  
From: **Non-Responsive**  
Sent: Thursday, June 29, 2017 11:02 AM  
To: Pruitt, Scott <Pruitt.Scott@epa.gov>  
Subject: Tremont City Barrel Fill

Dear Administrator Pruitt:

A copy of a portion of the last page going to City, County, Health District Commissioners, Township Trustees, and People for Safe Water.

The community has spent about \$970,000 trying to get the stuff treated. Full note by snail mail.

"In summary IF, IF, there is letter it requires recommendations about submission to Region 5 demand, 'accept or we leave with PRP monies', so must have:  
stipulations to assure independent verification of non-self insured financial assurance.  
For community benefit the submission needs to have assurances in writing signed by the site manager, superfund administration, and region administration that any and all federal brownfield resources will be made available for post remediation uses.  
Monitoring as a public record, including leachate.

If, IF, Submission then it ought to have National Register publication. If private market agreement becomes viable then, the toxicity might actually be reduced to the 30 year window of Region 5's policy procedure. If private market agreement is not viable then, the last thing anyone wants is partial remediation process with lots of goo on the ground.

Fifteen straight years of no nothing Region 5 involvement ? means  
50 samples from 5 test pits WITH DRUMS RETURNED!  
Over twenty years of ?natural attenuation? and still some waste will remain hazardous beyond the 30 years proposed time line.  
There is no post remedial plan.

Region 5 ignores 40 foot rise of water table surface in 3 months, does not treat, render, reduce, neutralize the: flammability, corrosivity, reactivity, nor toxicity of any solid, Fails to include thousands of drums from earlier EPA Superfund site ? Chem-Dyne ? going to subject, Fails to confirm new recipient site has radiologic license, Ignores the remaining half-life toxicity, flammability, corrosivity, and reactivity of hazardous waste of contaminants whose data presents as remaining so beyond the time in the ground with an additional 30 years of a liner system.  
Ignores the longevity of costs by insisting on using a non enforceable policy of 30 year limit rather than common sense to obtain true cost the total expense. Leaving waste incurs long term operations and maintenance beyond their 30 year window while treating within the 30 year window raises that cost because it actually treats, renders, reduces, neutralizes the flammability, corrosivity, reactivity, toxicity of hazardous wastes.  
Allows use of 7%, ?standard? depreciation when formula and how to use, both given to Region 5, and documented in NRRB's Raritan non-government site case, show a lower rate for a longer term ? meaning it costs a lot more for Alternative 9a because there is so much operations and maintenance costs that aren't in their ROD 30 year time limit.  
Ignores intent of NCP to treat. Removal of fluids doesn't treat sludge too thick to pass through paint filter test nor does it treat solids. Natural attenuation is not preferred over treatment.  
Threat, if you do not accept, we leave (with PRP monies).

THIS OUGHT TO BE GROUNDS FOR MALFEASANCE